

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BARKSDALE SCHOOL PORTRAITS LLC
d/b/a HOCKMEYER WITH BARKSDALE, and
BSP NEW ENGLAND, LLC d/b/a
HOCKMEYER WITH BARKSDALE

Plaintiffs,

-v-

ELIZABETH HOCKMEYER WILLIAMS
And E-LLUMINATIONS,

Defendants.

ELIZABETH HOCKMEYER WILLIAMS, E-
LLUMINATIONS (a d/b/a of JCW
CONSULTING, LLC) AND JEFF WILLIAMS

Counter and Cross-Claim Plaintiffs,
AND PLAINTIFFS

-v-

BARKSDALE SCHOOL PORTRAITS LLC
d/b/a HOCKMEYER WITH BARKSDALE,
BSP NEW ENGLAND, LLC d/b/a
HOCKMEYER WITH BARKSDALE, WAYNE
BARKSDALE, individually, and SUSAN
SHERIDAN, individually.

Counterclaim Defendants,

Civil Action No. 1:20-cv-11393-IT

Partially consolidated for discovery purposes
with Civil Action No. 1:20-cv-11640-IT

**REQUEST FOR JUNE 3, 2021 HEARING ON DEFENDANTS-COUNTERCLAIMS’
MOTION TO COMPEL AND FOR SANCTIONS [ECF Document 50]**

Elizabeth Williams (“Elizabeth” or “Ms Williams), individually and on behalf of E-
Luminations/JCW Consulting, LLC (“Defendants-Counterclaimants”), hereby request that, at this
Court’s currently scheduled hearing at 10:00 a.m. on June 3, 2021 on Plaintiffs’ Motion for

Sanctions, this Court also hears argument on Defendants-Counterclaimant's Motion to Compel and for Sanctions (ECF Document 50, and Proposed ECF Document 62-1). As grounds therefore:

1. Discovery is set to close within approximately one month.
2. As set forth in Defendants-Counterclaimants' Motion to Compel and for Sanctions (ECF Document 50), and the Proposed Reply that is requested to be filed therewith (ECF Document 62), there are 6 categories of documents that Plaintiffs are declining to produce, and continued depositions (as well as at least two additional depositions) that Defendants-Counterclaimants seek to be Ordered continued given document production issues, delays and further documents sought to be compelled. (Defendants-Counterclaim Plaintiffs have reviewed their Proposed Reply filing currently docketed at ECF Document 62-1, and noticed they did not include the exhibits to that Proposed Reply (as well as typographical errors to exhibit referenced. Accordingly, to correct those oversights, Defendants-Counterclaim plaintiffs file herewith a notice of a corrected Proposed Reply with exhibits in order for this Court to better assess permission to file such Proposed Reply.) Thus, given the parties will already be in Court on June 3, 2021, it serves judicial economy and efficiency if this Court will hear these matters on the same day and it will also help ensure the timely completion of discovery.
3. Further, as set forth in Defendants-Counterclaimants' Opposition to Plaintiffs' Motion for Sanctions, at p. 12 (ECF Document 52 at 12), Plaintiffs' own discovery misgivings demonstrate bad faith conduct in discovery that should be considered in the context of Plaintiffs seeking their own equitable relief from the Court in Plaintiffs' Motion for Sanctions. Accordingly, part of the pending Opposition to Plaintiffs' Motion on which

Defendants wish to be heard on June 3, 2021 is the detailing of the various issues giving rise to Defendants-Counterclaim Plaintiffs own Motion to Compel.

WHEREFORE, for the reasons above, Plaintiffs-Counterclaimants request that, at the June 3, 2021 hearing on Plaintiffs' Motion for Sanctions, this Court also hear argument on Defendants-Counterclaimants' Motion to Compel and for Sanctions.

Respectfully submitted,
**ELIZABETH HOCKMEYER WILLIAMS
AND E-LLUMINATIONS**
By their counsel,

Dated: June 2, 2021

/s/ Jeffrey M. Rosin
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CERTIFICATE OF SERVICE

The undersigned certifies that on June 2, 2021, a true copy of the above document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties who have appearances as of the time of this filing by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jeffrey M. Rosin
Jeffrey M. Rosin, Esq.